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May 15, 2013

Mrs. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Appellant: Richard Senturia, Consultant for the Applicant (CRN: 16040892)  
Applicant: Webster Groves School District  
BEN: 136910  
Form 471 #: 634312  
FRN #: 1754167, 1754301

Re: **Request for Review**

Administrator Denials for Invoice Deadline Extension Requests dated 4/18/13 and Earlier  
CC Docket No. 02-6

Dear Mrs. Dortch:

We are appealing USAC's denial of invoice deadline extension request and subsequent appeal for FRNs 1754167 and 1754301 in a letter dated April 28, 2013 having the following explanation:

- **Current invoice deadlines and procedures require that Invoice Deadline Extension requests be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension. The invoice receipt deadline is 120 days after the end of the service delivery date or 120 days after the date of the Form 486 Notification Letter whichever is later. USAC rejected your request for Invoice Deadline Extension because the request was not filed in a timely manner. Since USAC's decision was consistent with Invoice Deadline Extension guidelines, your appeal is denied.**

In our original request and subsequent appeal we explained to USAC that the applicant had encountered key administrative changes over a period of five (5) years and that these mission critical changes resulted in the loss of institutional knowledge of E-Rate rules, regulations, policies, procedures, guidelines and deadlines creating disruption in continuity of the applicant's E-Rate management process. Subsequently, the applicant failed to file timely Service Provider Invoice Election Letters for discounts or Billed Entity Applicant Reimbursement (BEAR) forms.

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The applicant complied with all other E-Rate program rules for the funding year and has already received services.

Granting this deadline extension request serves the public interest.

Granting this deadline extension request does not promote waste, fraud or abuse.

We respectfully request approval of our invoice deadline extension requests to allow the applicant to recover funds committed to that it has already paid for eligible services.

For the Applicant,

Richard Senturia, CEO  
eRateProgram, LLC.